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14 *Ultimate Fighting Championship and UFC*

15
16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18
19 Cung Le, Nathan Quarry, Jon Fitch, et al., on
20 behalf of themselves and all others similarly
situated,

21 Plaintiffs,

22 v.

23 Zuffa, LLC, d/b/a Ultimate Fighting
24 Championship and UFC,

25 Defendant.

Case No.: 2:15-cv-01045-RFB-PAL

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF ZUFFA,
LLC'S MOTION FOR EXTENSION OF
TIME TO FILE ITS REPLY IN
SUPPORT OF ITS MOTION FOR
PARTIAL SUMMARY JUDGMENT AS
TO PLAINTIFF NATHAN QUARRY
ON STATUTE OF LIMITATIONS
GROUNDS (ECF NO. 347) (Second
Request)**

DECLARATION OF STACEY K. GRIGSBY

I, Stacey K. Grigsby, declare as follows:

1. I am over 21 years old and have personal knowledge of the information in this declaration. I am a member in good standing of the bars of the District of Columbia and the state of New York. I am admitted *pro hac vice* to practice before this Court. I am a partner in the law firm Boies Schiller Flexner LLP, counsel for Zuffa, LLC (“Zuffa”) in the above-captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFP-PAL.

2. Except where otherwise stated, based on my review of the communications in this case, I have personal knowledge of the facts set forth in this Declaration and, if called to testify, could and would testify competently to those facts under oath.

3. The Discovery Plan and Scheduling Order (ECF No. 311) in this case requires that all fact discovery, including fact depositions, take place on or before May 1, 2017.

4. On April 7, 2017, Plaintiffs noticed the depositions of Kirk Hendrick and Lawrence Epstein. Counsel for Zuffa began preparing for the depositions of Mr. Hendrick and Mr. Epstein upon receiving deposition notices for those individuals.

5. On Friday, April 21, 2017, Plaintiffs filed an Emergency Motion to Reschedule Depositions (ECF No. 377) (“Emergency Motion”).

6. As the Emergency Motion sought to move two depositions, and counsel and the witnesses had made arrangements to attend both depositions, one of which was scheduled for the next business day, Zuffa had to draft and submit its opposition to Plaintiffs’ motion as quickly as possible.

7. Zuffa filed its opposition to the Emergency Motion at 5:09 p.m. that same day.

8. On Friday, April 21 at 10:26 p.m. Eastern time, Mr. Rayhill informed counsel for Zuffa via e-mail that Plaintiffs would not be taking the depositions of Mr. Hendrick and Mr. Epstein.

9. Plaintiffs waited until the final month of fact discovery to serve a large number of notices of deposition and subpoenas. I have received copies of 40 deposition notices and

1 subpoenas from Plaintiffs' counsel. I am aware that Plaintiffs have taken 13 depositions to date.
2 In the last 30 days, I have received approximately 16 deposition notices and subpoenas, including
3 amended notices. Plaintiffs voluntarily and unilaterally selected deposition dates, many of which
4 the witnesses or their counsel were unavailable for. Nevertheless, my colleagues and I have been
5 forced to spend hundreds of hours preparing for noticed depositions that would not proceed as
6 scheduled.

7 10. Since early March, Zuffa has been working diligently to prepare for all of the
8 depositions that were scheduled for April as well as the depositions that are scheduled to take
9 place in early May.

10
11 I declare under penalty of perjury that the foregoing statements are true and correct.
12 Executed this 23rd day of April, 2017 in Washington, D.C.

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14 By: /s/ Stacey K. Grigsby
15 Stacey K. Grigsby
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